

## **Exhibit 4**

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15 GOOGLE LLC

16 **UNITED STATES DISTRICT COURT**  
17 **NORTHERN DISTRICT OF CALIFORNIA**  
18 **SAN FRANCISCO**

19 ANIBAL RODRIGUEZ AND JULIEANNA  
20 MUNIZ, individually and on behalf of all other  
21 similarly situate

22 Plaintiff  
23 vs  
24 GOOGLE LLC, *et al.*

25 Defendant.

26 Case No. 3:20-CV-04688

27 **DEFENDANT GOOGLE LLC'S  
28 RESPONSES TO PLAINTIFFS'  
REQUEST FOR PRODUCTION OF  
DOCUMENTS, SET THREE**

29 Judge: Hon. Richard Seeborg  
30 Courtroom: 3, 17th Floor  
31 Action Filed: July 14, 2020  
32 Trial Date: Not Set

33 PROPOUNDING PARTY: PLAINTIFFS ANIBAL RODRIGUEZ AND JULIEANNA MUNIZ

34 RESPONDING PARTY: DEFENDANT GOOGLE LLC

35 SET NO.: THREE

36 Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure ("Federal Rules") and the  
37 Civil Local Rules of the United States District Court for the Central District of California ("Local  
38 Rules"), Defendant Google LLC ("Defendant" or "Google") hereby submits these objections and  
39 responses to Plaintiffs Anibal Rodriguez, JulieAnna Muniz, Eliza Cambay, Sal Cataldo, Emir  
40 Goenaga, Julian Santiago, Harold Nyanjom, Kellie Nyanjom, and Susan Lynn Harvey ("Plaintiffs")

1 Third Set of Request for Production of Documents (each a “Request” and collectively the  
 2 “Requests”), served on Defendant on December 22, 2020.

3 **PRELIMINARY STATEMENT GENERAL OBJECTIONS**

4 1. Each of Google’s responses is subject to, and incorporates, the following general  
 5 statement and objections. Google specifically incorporates each of these general objections into its  
 6 responses to each of Plaintiffs’ Requests, whether or not each such general objection is expressly  
 7 referred to in Google’s responses to a specific request.

8 2. An agreement to produce responsive documents or things in the responses below  
 9 means only that Google will produce relevant and responsive non-privileged documents or things  
 10 within its possession, custody or control that it identifies after a reasonable search and diligent  
 11 inquiry, and is not a representation that any such documents or things exist.

12 3. Google objects to the instructions, definitions, and Requests to the extent that they are  
 13 broader than, or attempt to impose conditions, obligations, or duties beyond those required by the  
 14 Federal Rules and/or the Local Rules. Google’s responses will be provided in accordance with the  
 15 Federal Rules and the Local Rules. Google further objects that these requests are overly  
 16 burdensome given the procedural posture of this case. Google’s Motion to Dismiss is set to be  
 17 heard on March 4, 2020, yet Plaintiffs seek even more discovery than they could otherwise obtain  
 18 if the pleadings were settled.

19 4. Google objects to any Request to the extent that it seeks information, documents or  
 20 things protected from discovery by: (a) the attorney-client privilege; (b) the attorney work-product  
 21 doctrine; (c) the common-interest and joint-defense doctrines; and/or (d) any other applicable  
 22 privilege, doctrine, immunity or protection from disclosure afforded by state or federal law. The  
 23 inadvertent production by Google of information protected from disclosure by any privilege or  
 24 doctrine shall not constitute a waiver by Google of such protections.

25 5. Google objects to any Request to the extent that it is overbroad, unduly burdensome,  
 26 compound, and/or oppressive, or purports to impose upon Google any duty or obligation that is  
 27 inconsistent with or in excess of those obligations that are imposed by the Federal Rules, the Local  
 28 Rules, or any other applicable rule or Court order. In particular, Google objects to any Request to

1 the extent that it calls for information not relevant to the claims or defenses of the parties, or  
 2 proportional to the needs of this case.

3 6. Google objects to each Request to the extent it is vague, ambiguous, overly broad, or  
 4 unduly burdensome as to timeframe.

5 7. Google objects to the instructions, definitions, and Requests to the extent they seek or  
 6 purport to require the identification of “any,” “all,” “each,” or “every” document, communication,  
 7 person, entity, or other thing regarding or relating to a particular subject matter, as unduly  
 8 burdensome, overbroad, and not proportional to the needs of the Action.

9 8. Google objects to any request to the extent that it seeks the premature disclosure of  
 10 expert opinions or analysis. Google will disclose its experts’ opinions and analyses in accordance  
 11 with the Federal Rules, Local Rules, and the scheduling order that the Court will set forth.

12 9. Google objects to any Request to the extent that it purports to attribute any special or  
 13 unusual meaning to any term or phrase.

14 10. Google objects to any instruction or Request to the extent that it would impose a duty  
 15 on Google to undertake a search for, or an evaluation of, information, documents, or things for  
 16 which Plaintiff is equally able to search for and evaluate, including documents that are publicly  
 17 available, in the possession of third parties, and/or are already in the possession of Plaintiff.

18 11. Subject to the objections stated in these responses, and to the extent that Google has  
 19 agreed to produce responsive documents or things, Google will produce such documents or things,  
 20 to the extent they exist and are identified after a reasonable and diligent search, at a date and  
 21 location to be agreed upon by counsel and in accordance with the scheduling order in this Action.

22 12. Google objects to any instruction or Request as unduly burdensome and oppressive to  
 23 the extent that it seeks documents or things which Google does not track and prepare in the regular  
 24 course of business. An agreement by Google to produce a document or things for purposes of this  
 25 Action does not waive this objection.

26 13. Google objects to the Requests to the extent they seek confidential, proprietary, or  
 27 trade secret information of third parties.

1       14. Google's objections and responses to these Requests are not intended to waive or  
 2 prejudice any objections Google may assert now or in the future, including, without limitation,  
 3 objections as to the relevance of the subject matter of any Request, or as to the admissibility of any  
 4 information or category of information at trial or in any other proceedings. Google expressly  
 5 reserves any and all rights and privileges under the Federal Rules of Civil Procedure, the Federal  
 6 Rules of Evidence, the Local Rules, and any other applicable laws or rules, and the failure to assert  
 7 such rights and privileges or the inadvertent disclosure by Google of information protected by such  
 8 rights and privileges shall not constitute a waiver thereof, either with respect to these responses or  
 9 with respect to any future discovery responses or objections.

10      15. Google objects to these Requests to the extent that they require Google to search,  
 11 review, and produce emails or other electronic documents outside the scope of the Federal Rules  
 12 or any other relevant rules or Court orders.

13      16. Google objects to Plaintiff's "Definitions" and to any Request to the extent they  
 14 purport to give meaning or legal significance to a document, fact, or purported fact whose meaning  
 15 or significance is subject to dispute between the parties. Google's responses to each of Plaintiff's  
 16 Requests shall not constitute an admission or concession to any of the definitions, terms, and  
 17 phrases used therein. By responding to any Request, Google does not concede the relevance or  
 18 admissibility of any of the information provided.

19      17. By responding to any Request, Google does not assume the burden of persuasion or  
 20 burden of production as to any issue therein.

21      18. Google has responded to the Requests as it interprets and understands them. If  
 22 Plaintiffs subsequently asserts an interpretation of any Request that differs from Google's  
 23 understanding of that Request, Google reserves the right to supplement its objections and/or  
 24 responses.

25      19. Discovery in this matter is ongoing. Accordingly, Google reserves the right to change,  
 26 amend, or supplement any or all of the matters contained and/or documents produced pursuant to  
 27 these responses as Google's investigation continues, additional facts are ascertained, analyses are  
 28

1 made, research is completed, and additional documents are subsequently discovered, collected,  
 2 and/or reviewed.

3 **OBJECTIONS TO DEFINITIONS**

4 20. Google objects to the definitions of “COMMUNICATION,” “DOCUMENT,”  
 5 “DOCUMENTS,” and “IDENTIFY” to the extent that they purport to include forms of  
 6 information not discoverable under the Federal Rules, Local Rules, or any other applicable  
 7 authority. Google further objects to the definitions to the extent they define a category of  
 8 documents in an overbroad manner and/or requests a production of documents which would be  
 9 unduly burdensome or disproportionate to the needs of the litigation.

10 21. Google objects to the definition of “GOOGLE” as vague and ambiguous. Google  
 11 construes GOOGLE to mean Google LLC. Google further objects to this definition to the extent  
 12 that it purports to include forms of information not discoverable under the Federal Rules, the  
 13 Local Rules, or any other applicable authority. Google also objects to the definition to the extent  
 14 that it defines a category of documents in an overbroad manner and/or requests a production of  
 15 documents which would be unduly burdensome or disproportionate to the needs of this Action.  
 16 Google further objects to the extent it seeks information or refers to documents controlled by  
 17 individuals who are not parties to this litigation and/or which are not within Google’s control.

18 22. Google objects to the definition of “YOU” and “YOUR” as vague and ambiguous.  
 19 Google construes “YOU” and “YOUR” to mean Google LLC. Google further objects to this  
 20 definition to the extent that it purports to include forms of information not discoverable under the  
 21 Federal Rules, the Local Rules, or any other applicable authority. Google also objects to the  
 22 definition to the extent that it defines a category of documents in an overbroad manner and/or  
 23 requests a production of documents which would be unduly burdensome or disproportionate to the  
 24 needs of this Action. Google further objects to the extent it seeks information or refers to documents  
 25 controlled by individuals who are not parties to this litigation and/or which are not within Google’s  
 26 control.

## **RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

**REQUEST FOR PRODUCTION NO. 31:**

Documents concerning Google's decision to not make data Google collected while users have Web & App Activity turned off viewable to users through their Google account.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 31:**

Google incorporates its general responses and objections as set forth above. Google further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and abusive given Judge Seeborg’s admonition that discovery prior to adjudication of the Motion to Dismiss should be propounded judiciously. Google has already provided responses to 41 different Requests and begun producing responsive documents to the first two sets of Requests for Production of Documents; (ii) it is vague and ambiguous as to the undefined terms “Google’s decision” and “data Google collected;” (iii) it is overbroad and unduly burdensome and seeks documents that are not relevant to any claim or defense in this Action; (iv) it is unduly burdensome, overboard, and disproportionate to the needs of the Action to the extent that it is unbounded in time and/or seeks documents from a time period unrelated to the operative factual allegations; (v) it seeks documents protected by the attorney-client privilege and/or the attorney work-product doctrine; and (vi) it seeks documents that are not in Google’s possession, custody, or control.

Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet and confer concerning whether and to what extent there is an appropriate scope of production that is a subset of this Request.

**REQUEST FOR PRODUCTION NO. 32:**

Google's logs relating to the data it collects directly and indirectly from, about, or on consumers, including while users have Web & App Activity turned off.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 32:**

Google incorporates its general responses and objections as set forth above. Google further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to

1 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 2 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 3 of Documents; (ii) it is vague and ambiguous as to the undefined terms “Google logs” and “it collects  
 4 directly and indirectly from, about, or on consumers;” (iii) it is overbroad and unduly burdensome and  
 5 seeks documents that are not relevant to any claim or defense in this Action; (iv) it is unduly  
 6 burdensome, overboard, and disproportionate to the needs of the Action to the extent that it is  
 7 unbounded in time and/or seeks documents from a time period unrelated to the operative factual  
 8 allegations; (v) it seeks documents protected by the attorney-client privilege and/or the attorney work-  
 9 product doctrine; and (vi) it is duplicative of at least Request Nos. 5-6, 8, 10, 19, and 22. Google has  
 10 already produced public disclosures during the relevant time period identifying the types of activity  
 11 Google saves to a user’s account when Web & App Activity is turned off versus turned off.

12 **REQUEST FOR PRODUCTION NO. 33:**

13 Documents sufficient to show how Google scripts cause apps using Google’s Firebase SDK to  
 14 send information to Google’s servers, including when users have Web & App Activity turned off.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 33:**

16 Google incorporates its general responses and objections as set forth above. Google  
 17 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 18 abusive given Judge Seeborg’s admonition that discovery prior to adjudication of the Motion to  
 19 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 20 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 21 of Documents; (ii) it is vague and ambiguous as to the undefined term “Google scripts cause apps;”  
 22 (iii) it is overbroad and unduly burdensome and seeks documents that are not relevant to any claim or  
 23 defense in this Action; and (iv) it is unduly burdensome, overboard, and disproportionate to the needs  
 24 of the Action to the extent that it is unbounded in time and/or seeks documents from a time period  
 25 unrelated to the operative factual allegations.

1       Subject to and without waiving the foregoing objections, Google responds that it will  
 2 produce documents sufficient to show how app developers can use Google scripts as part of  
 3 Google Analytics for Firebase to send information to Google's servers.

4 **REQUEST FOR PRODUCTION NO. 34:**

5       Google's source code for the Google scripts that cause apps using Google's Firebase SDK to  
 6 send information to Google's servers, including when users have Web & App Activity turned off.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 34:**

8       Google incorporates its general responses and objections as set forth above. Google  
 9 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 10 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 11 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 12 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 13 of Documents; (ii) it is vague and ambiguous as to the undefined terms "Google scripts that cause  
 14 apps," "send information to Google's servers," and "Google's Firebase SDK;" (iii) it is overbroad and  
 15 unduly burdensome and seeks documents that are not relevant to any claim or defense in this Action;  
 16 (iv) it is unduly burdensome, overboard, and disproportionate to the needs of the Action to the extent  
 17 that it is unbounded in time and/or seeks documents from a time period unrelated to the operative  
 18 factual allegations; (v) it seeks documents protected by the attorney-client privilege and/or the attorney  
 19 work-product doctrine; (vi) it calls for the disclosure of trade secrets or highly confidential and  
 20 proprietary business information, the disclosure of which threatens to harm Google. Additionally, the  
 21 production of source code may require a modification of the protective order.

22       Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 23 and confer concerning whether and to what extent there is an appropriate scope of production that  
 24 is a subset of this Request.

1 **REQUEST FOR PRODUCTION NO. 35:**

2 Documents relating to how Google's technologies and services work with the consumer data  
 3 that Google collects, including data Google collects while consumers have Web & App Activity turned  
 4 off.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 35:**

6 Google incorporates its general responses and objections as set forth above. Google  
 7 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 8 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 9 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 10 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 11 of Documents; (ii) it is vague and ambiguous as to the undefined term "Google's technologies and  
 12 services work with the consumer data that Google collects;" (iii) it is overbroad and unduly  
 13 burdensome and seeks documents that are not relevant to any claim or defense in this Action; (iv) it is  
 14 unduly burdensome, overboard, and disproportionate to the needs of the Action to the extent that it is  
 15 unbounded in time and/or seeks documents from a time period unrelated to the operative factual  
 16 allegations; (v) it seeks documents protected by the attorney-client privilege and/or the attorney work-  
 17 product doctrine; and (vi) it seeks documents that are not in Google's possession, custody, or control.

18 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 19 and confer concerning whether and to what extent there is an appropriate scope of production that  
 20 is a subset of this Request.

21 **REQUEST FOR PRODUCTION NO. 36:**

22 Documents relating to how Google tracks individual consumers, including their app activity,  
 23 devices, and locations.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 36:**

25 Google incorporates its general responses and objections as set forth above. Google  
 26 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 27 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to

1 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 2 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 3 of Documents; (ii) it is vague and ambiguous as to the undefined term “Google tracks individual  
 4 consumers;” (iii) it is overbroad and unduly burdensome and seeks documents that are not relevant to  
 5 any claim or defense in this Action; (iv) it is unduly burdensome, overboard, and disproportionate to  
 6 the needs of the Action to the extent that it is unbounded in time and/or seeks documents from a time  
 7 period unrelated to the operative factual allegations; (v) it seeks documents protected by the attorney-  
 8 client privilege and/or the attorney work-product doctrine; and (vi) it seeks documents that are not in  
 9 Google’s possession, custody, or control.

10 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 11 and confer concerning whether and to what extent there is an appropriate scope of production that  
 12 is a subset of this Request.

13 **REQUEST FOR PRODUCTION NO. 37:**

14 Documents sufficient to identify all apps that during the Class Period have used Google’s  
 15 Firebase SDK, including the dates during which each app used Google’s Firebase SDK.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 37:**

17 Google incorporates its general responses and objections as set forth above. Google  
 18 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 19 abusive given Judge Seeborg’s admonition that discovery prior to adjudication of the Motion to  
 20 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 21 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 22 of Documents; (ii) it is vague and ambiguous as to the undefined term “Google’s Firebase SDK;” (iii)  
 23 it seeks documents protected by the attorney-client privilege and/or the attorney work-product  
 24 doctrine; (iv) it seeks documents that are not in Google’s possession, custody, or control; and (v) it  
 25 contains several subparts which constitute a separate Request.

26 Subject to and without waiving the foregoing objections, Google responds that it has  
 27 already provided Plaintiffs with information in response to an interrogatory concerning which of  
 28

1 Plaintiffs' alleged apps have used Google Analytics for Firebase. Google invites Plaintiffs to meet  
 2 and confer concerning whether and to what extent there is an appropriate scope of production that  
 3 is a subset of this Request.

4 **REQUEST FOR PRODUCTION NO. 38:**

5 Documents sufficient to identify all apps from which Google during the Class Period collected  
 6 data while users had Web & App Activity turned off and the time periods during which Google collected  
 7 that data from each such app.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 38:**

9 Google incorporates its general responses and objections as set forth above. Google  
 10 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 11 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 12 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 13 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 14 of Documents; (ii) it is vague and ambiguous as to the undefined term "Google collected that data;"  
 15 (iii) it seeks documents protected by the attorney-client privilege and/or the attorney work-product  
 16 doctrine; (iv) it seeks documents that are not in Google's possession, custody, or control; (v) it  
 17 contains several subparts which constitute a separate Request; and (vi) it is overbroad and unduly  
 18 burdensome and seeks documents that are not relevant to any claims or defenses in this Action.

19 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 20 and confer concerning whether and to what extent there is an appropriate scope of production that  
 21 is a subset of this Request.

22 **REQUEST FOR PRODUCTION NO. 39:**

23 Documents concerning the use of Firebase SDK by app developers, including Google's efforts  
 24 to increase use of Firebase SDK as alleged in paragraph 42 of the First Amended Complaint.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 39:**

26 Google incorporates its general responses and objections as set forth above. Google  
 27 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 28

1 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 2 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 3 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 4 of Documents; (ii) it is vague and ambiguous as to the undefined terms "Concerning the use of  
 5 Firebase SDK" and "Google's efforts to increase use of Firebase SDK"; (iii) it seeks documents  
 6 protected by the attorney-client privilege and/or the attorney work-product doctrine; (iv) it seeks  
 7 documents that are not in Google's possession, custody, or control; (v) it is unduly burdensome,  
 8 overbroad, and disproportionate to the needs of the Action to the extent that it is unbounded in time  
 9 and/or seeks documents from a time period unrelated to the operative factual allegations; and (vi) it is  
 10 overbroad and unduly burdensome and seeks documents that are not relevant to any claims or defenses  
 11 in this Action.

12 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 13 and confer concerning whether and to what extent there is an appropriate scope of production that  
 14 is a subset of this Request.

15 **REQUEST FOR PRODUCTION NO. 40:**

16 Google's source code embedded into the code of apps that use Firebase SDK or Google  
 17 Analytics for Firebase.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 40:**

19 Google incorporates its general responses and objections as set forth above. Google  
 20 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 21 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 22 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 23 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 24 of Documents; (ii) it is vague and ambiguous as to the undefined term "embedded into the code of  
 25 apps that use Firebase SDK or Google Analytics for Firebase;" (iii) it is overbroad and unduly  
 26 burdensome and seeks documents that are not relevant to any claim or defense in this Action; (iv) it is  
 27 unduly burdensome, overboard, and disproportionate to the needs of the Action to the extent that it is  
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1 unbounded in time and/or seeks documents from a time period unrelated to the operative factual  
 2 allegations; (v) it seeks documents protected by the attorney-client privilege and/or the attorney work-  
 3 product doctrine; (vi) it calls for the disclosure of trade secrets or highly confidential and proprietary  
 4 business information, the disclosure of which threatens to harm Google. Additionally, the production  
 5 of source code may warrant modifications to the protective order; and (vii) is duplicative of at least  
 6 Request No. 34.

7 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 8 and confer concerning whether and to what extent there is an appropriate scope of production that  
 9 is a subset of this Request.

10 **REQUEST FOR PRODUCTION NO. 41:**

11 Documents sufficient to show all types and the amount of data collected with Firebase SDK or  
 12 Google Analytics for Firebase, including in connection with users' activity while Web & App Activity  
 13 is turned off.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 41:**

15 Google incorporates its general responses and objections as set forth above. Google  
 16 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 17 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 18 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 19 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 20 of Documents; (ii) it is vague and ambiguous as to the undefined term "all types and the amount of  
 21 data collected with Firebase SDK or Google Analytics for Firebase;" (iii) it is overbroad and unduly  
 22 burdensome and seeks documents that are not relevant to any claim or defense in this Action; (iv) it is  
 23 unduly burdensome, overboard, and disproportionate to the needs of the Action to the extent that it is  
 24 unbounded in time and/or seeks documents from a time period unrelated to the operative factual  
 25 allegations; (v) it seeks documents protected by the attorney-client privilege and/or the attorney work-  
 26 product doctrine; and (vi) it seeks documents that are not in Google's possession, custody, or control.

1       Subject to and without waiving the foregoing objections, Google responds that it will  
 2 produce documents sufficient to show the types of data sent to Google by Google Analytics for  
 3 Firebase. Google invites Plaintiffs to meet and confer concerning whether and to what extent there  
 4 is an appropriate scope of production that is a subset of this Request.

5 **REQUEST FOR PRODUCTION NO. 44:**

6       Google's source code for Google Analytics for Firebase and Google's various ad properties that  
 7 run on Google's servers, to assess how Google collects and uses data from users' activity while Web &  
 8 App Activity is turned off.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 44:**

10       Google incorporates its general responses and objections as set forth above. Google  
 11 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 12 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 13 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 14 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 15 of Documents; (ii) it is vague and ambiguous as to the undefined terms "Google Analytics for  
 16 Firebase," "various ad properties that run on Google's servers," and "assess how Google collects and  
 17 uses data; (iii) it is overbroad and unduly burdensome and seeks documents that are not relevant to  
 18 any claim or defense in this Action; (iv) it is unduly burdensome, overboard, and disproportionate to  
 19 the needs of the Action to the extent that it is unbounded in time and/or seeks documents from a time  
 20 period unrelated to the operative factual allegations; (v) it seeks documents protected by the attorney-  
 21 client privilege and/or the attorney work-product doctrine; (vi) it is duplicative of at least Request Nos.  
 22 34 and 40; and (vii) it calls for the disclosure of trade secrets or highly confidential and proprietary  
 23 business information, the disclosure of which threatens to harm Google. Additionally, the production  
 24 of source code will warrant modifications to the protective order.

25       Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 26 and confer concerning whether and to what extent there is an appropriate scope of production that  
 27 is a subset of this Request.

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3 **REQUEST FOR PRODUCTION NO. 45:**

4 Google's schemas or definition files sufficient to define the data structures used to communicate  
 5 between client-side scripts and their backends, to assess how Google collects and uses data in connection  
 6 with users' activity while Web & App Activity is turned off.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 45:**

8 Google incorporates its general responses and objections as set forth above. Google  
 9 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 10 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 11 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 12 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 13 of Documents; (ii) it is vague and ambiguous as to the undefined terms "Google schemas or definition  
 14 files," "data structures used to communicate between client-side scripts and their backends," and  
 15 "assess how Google collects and uses data;" (iii) it is overbroad and unduly burdensome and seeks  
 16 documents that are not relevant to any claim or defense in this Action; (iv) it is unduly burdensome,  
 17 overboard, and disproportionate to the needs of the Action to the extent that it is unbounded in time  
 18 and/or seeks documents from a time period unrelated to the operative factual allegations; (v) it seeks  
 19 documents protected by the attorney-client privilege and/or the attorney work-product doctrine; and  
 20 (vi) it calls for the disclosure of trade secrets or highly confidential and proprietary business  
 21 information, the disclosure of which threatens to harm Google. Additionally, production of source  
 22 code will warrant modifications to the protective order.

23 Subject to and without waiving the foregoing objections, Google responds that it will  
 24 produce documents sufficient to show the types of data sent to Google by Google Analytics for  
 25 Firebase. Google invites Plaintiffs to meet and confer concerning whether and to what extent there  
 26 is an appropriate scope of production that is a subset of this Request.

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3 **REQUEST FOR PRODUCTION NO. 46:**

4 Documents sufficient to identify all types of profiles created by Google during the Class Period,  
 5 including profiles containing any data collected in connection with users' activity while Web & App  
 6 Activity is turned off.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 46:**

8 Google incorporates its general responses and objections as set forth above. Google  
 9 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 10 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 11 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 12 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 13 of Documents; (ii) it is vague and ambiguous as to the undefined term "all types of profiles created by  
 14 Google;" (iii) it is overbroad and unduly burdensome and seeks documents that are not relevant to any  
 15 claim or defense in this Action; (iv) it seeks documents protected by the attorney-client privilege  
 16 and/or the attorney work-product doctrine; and (v) it seeks documents that are not in Google's  
 17 possession, custody, or control.

18 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 19 and confer concerning whether and to what extent there is an appropriate scope of production that  
 20 is a subset of this Request.

21 **REQUEST FOR PRODUCTION NO. 47:**

22 Documents sufficient to identify all ways in which Google used profiles during the Class Period,  
 23 including profiles containing any data collected in connection with users' activity while Web & App  
 24 Activity is turned off.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 47:**

26 Google incorporates its general responses and objections as set forth above. Google  
 27 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 28

1 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 2 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 3 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 4 of Documents; (ii) it is vague and ambiguous as to the undefined term "all ways in which Google used  
 5 profiles;" (iii) it is overbroad and unduly burdensome and seeks documents that are not relevant to any  
 6 claim or defense in this Action; (iv) it seeks documents protected by the attorney-client privilege  
 7 and/or the attorney work-product doctrine; and (v) it seeks documents that are not in Google's  
 8 possession, custody, or control.

9 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 10 and confer concerning whether and to what extent there is an appropriate scope of production that  
 11 is a subset of this Request.

12 **REQUEST FOR PRODUCTION NO. 48:**

13 Documents relating to Google's linking of collected website and app activity to a particular  
 14 profile during the Class Period, including instructions, manuals, protocols, or policies.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 48:**

16 Google incorporates its general responses and objections as set forth above. Google  
 17 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 18 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 19 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 20 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 21 of Documents; (ii) it is vague and ambiguous as to the undefined term "Google's linking of collected  
 22 website and app activity to a particular profile"; (iii) it is overbroad and unduly burdensome and seeks  
 23 documents that are not relevant to any claim or defense in this Action; and (iv) it seeks documents  
 24 protected by the attorney-client privilege and/or the attorney work-product doctrine.

25 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 26 and confer concerning whether and to what extent there is an appropriate scope of production that  
 27 is a subset of this Request.

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3 **REQUEST FOR PRODUCTION NO. 49:**

4 Google's compliance and audit documents relating to its efforts or failures to comply with the  
 5 Google-2011 FTC Consent Decree.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 49:**

7 Google incorporates its general responses and objections as set forth above. Google  
 8 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 9 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 10 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 11 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 12 of Documents; (ii) it is vague and ambiguous as to the undefined term "Google – 2011 FTC Consent  
 13 Decree;" (iii) it is overbroad and unduly burdensome and seeks documents that are not relevant to any  
 14 claim or defense in this Action; and (iv) it seeks documents protected by the attorney-client privilege  
 15 and/or the attorney work-product doctrine.

16 **REQUEST FOR PRODUCTION NO. 50:**

17 Documents relating to how Google attempted to comply or complied with the California  
 18 Consumer Privacy Act (CCPA), Europe's General Data Privacy Regulation (GDPR), and any other  
 19 similar legislation.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 50:**

21 Google incorporates its general responses and objections as set forth above. Google  
 22 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 23 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 24 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 25 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 26 of Documents; (ii) it is vague and ambiguous as to the undefined term "and any other similar  
 27 legislation;" (iii) it is overbroad and unduly burdensome and seeks documents that are not relevant to  
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1 any claim or defense in this Action; (iv) it is unduly burdensome, overboard, and disproportionate to  
 2 the needs of the Action to the extent that it is unbounded in time and/or seeks documents from a time  
 3 period unrelated to the operative factual allegations; (v) it seeks documents protected by the attorney-  
 4 client privilege and/or the attorney work-product doctrine; and (vi) it seeks documents that are not in  
 5 Google's possession, custody, or control.

6 **REQUEST FOR PRODUCTION NO. 51:**

7 Documents relating to how Google lobbied for or against bills and proposed laws in the United  
 8 States similar to or based on the California Consumer Privacy Act or the California Privacy Rights Act.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 51:**

10 Google incorporates its general responses and objections as set forth above. Google  
 11 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 12 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 13 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 14 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 15 of Documents; (ii) it is vague and ambiguous as to the undefined term "proposed laws in the United  
 16 States similar to or based on;" (iii) it is overbroad and unduly burdensome and seeks documents that  
 17 are not relevant to any claim or defense in this Action; (iv) it is unduly burdensome, overboard, and  
 18 disproportionate to the needs of the Action to the extent that it is unbounded in time and/or seeks  
 19 documents from a time period unrelated to the operative factual allegations; (v) it seeks documents  
 20 protected by the attorney-client privilege and/or the attorney work-product doctrine; and (vi) it seeks  
 21 documents that are not in Google's possession, custody, or control.

22 **REQUEST FOR PRODUCTION NO. 52:**

23 Source code for Web & App Activity, including documents sufficient to identify changes to that  
 24 source code since Google first added Web & App Activity.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 52:**

26 Google incorporates its general responses and objections as set forth above. Google  
 27 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 28

1 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 2 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 3 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 4 of Documents; (ii) it is vague and ambiguous as to the undefined term "identify changes to that source  
 5 code;" (iii) it is overbroad and unduly burdensome and seeks documents that are not relevant to any  
 6 claim or defense in this Action; (iv) it is unduly burdensome, overboard, and disproportionate to the  
 7 needs of the Action to the extent that it is unbounded in time and/or seeks documents from a time  
 8 period unrelated to the operative factual allegations; (v) it seeks documents protected by the attorney-  
 9 client privilege and/or the attorney work-product doctrine; (vi) it is duplicative of at least Request Nos.  
 10 34, 40, and 44; and (vii) it calls for the disclosure of trade secrets or highly confidential and  
 11 proprietary business information, the disclosure of which threatens to harm Google. Additionally,  
 12 production of source code will warrant modifications to the protective order.

13 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 14 and confer concerning whether and to what extent there is an appropriate scope of production that  
 15 is a subset of this Request.

16 **REQUEST FOR PRODUCTION NO. 53:**

17 Source code for the Firebase SDK, including documents sufficient to identify changes to that  
 18 source code since Google first made the Firebase SDK available.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 53:**

20 Google incorporates its general responses and objections as set forth above. Google  
 21 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 22 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 23 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 24 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 25 of Documents; (ii) it is vague and ambiguous as to the undefined terms "identify changes to that  
 26 source code" and "Firebase SDK;" (iii) it is overbroad and unduly burdensome and seeks documents  
 27 that are not relevant to any claim or defense in this Action; (iv) it is unduly burdensome, overboard,  
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1 and disproportionate to the needs of the Action to the extent that it is unbounded in time and/or seeks  
 2 documents from a time period unrelated to the operative factual allegations; (v) it seeks documents  
 3 protected by the attorney-client privilege and/or the attorney work-product doctrine; (vi) it is  
 4 duplicative of at least Request Nos. 34, 40, 44, and 52; and (vii) it calls for the disclosure of trade  
 5 secrets or highly confidential and proprietary business information, the disclosure of which threatens  
 6 to harm Google. Additionally, production of source code will warrant modifications to the protective  
 7 order.

8 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 9 and confer concerning whether and to what extent there is an appropriate scope of production that  
 10 is a subset of this Request.

11 **REQUEST FOR PRODUCTION NO. 54:**

12 Documents going back to January 1, 2009 concerning any efforts by any third parties (including  
 13 app developers and competitors such as Apple) to limit Google's tracking or data collection in any way,  
 14 including the actual, potential, or anticipated impact on Google.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 54:**

16 Google incorporates its general responses and objections as set forth above. Google  
 17 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 18 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 19 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 20 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 21 of Documents; (ii) it is vague and ambiguous as to the undefined terms "any efforts by third parties,"  
 22 and "limit Google's tracking or data collection;" (iii) it is overbroad and unduly burdensome and seeks  
 23 documents that are not relevant to any claim or defense in this Action; (iv) it seeks documents  
 24 protected by the attorney-client privilege and/or the attorney work-product doctrine; and (v) it calls for  
 25 documents that are not in Google's possession, custody, or control.

26 **REQUEST FOR PRODUCTION NO. 55:**

1 Documents concerning all changes made by Google since January 1, 2009 to its data collection  
 2 practices while users have Web & App Activity turned off.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 55:**

4 Google incorporates its general responses and objections as set forth above. Google  
 5 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 6 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 7 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 8 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 9 of Documents; (ii) it is vague and ambiguous as to the undefined term "all changes made by Google  
 10 since January 1, 2009 to its data collection practices;" (iii) it is overbroad and unduly burdensome and  
 11 seeks documents that are not relevant to any claim or defense in this Action; (iv) it seeks documents  
 12 protected by the attorney-client privilege and/or the attorney work-product doctrine; and (v) it calls for  
 13 documents that are not in Google's possession, custody, or control.

14 **REQUEST FOR PRODUCTION NO. 58:**

15 Documents sufficient to show all Google revenues and profits from Google's collection of data  
 16 while users have Web & App Activity turned off, during the Class Period, broken down by month.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 58:**

18 Google incorporates its general responses and objections as set forth above. Google  
 19 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 20 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 21 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 22 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 23 of Documents; (ii) it is vague and ambiguous as to the undefined term "Google's collection of data";  
 24 (iii) it is overbroad and unduly burdensome and seeks documents that are not relevant to any claim or  
 25 defense in this Action; (iv) it seeks documents protected by the attorney-client privilege and/or the  
 26 attorney work-product doctrine; and (v) it calls for documents that are not in Google's possession,  
 27 custody, or control.

**REQUEST FOR PRODUCTION NO. 59:**

Google's sales documents relating to its profits from Google Analytics or Google Ad Manager (and legacy products that were eventually merged into Google Analytics or Google Ad Manager) that relate to how Google profited as alleged in the First Amended Complaint.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 59:**

Google incorporates its general responses and objections as set forth above. Google further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to Dismiss should be propounded judiciously. Google has already provided responses to 41 different Requests and begun producing responsive documents to the first two sets of Requests for Production of Documents; (ii) it is vague and ambiguous as to the undefined term "Google's sales documents relating to its profits;" (iii) it is overbroad and unduly burdensome and seeks documents that are not relevant to any claim or defense in this Action; (iv) it is unduly burdensome, overboard, and disproportionate to the needs of the Action to the extent that it is unbounded in time and/or seeks documents from a time period unrelated to the operative factual allegations; (v) it seeks documents protected by the attorney-client privilege and/or the attorney work-product doctrine; and (vi) it calls for the production of documents that are not in Google's possession, custody, or control.

**REQUEST FOR PRODUCTION NO. 60:**

Google's documents showing how Google improved its Google products and services (including but not limited to Search, Google Analytics, and Google Ad Manager) based on data Google obtained and currently obtains while users have Web & App Activity turned off.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 60:**

Google incorporates its general responses and objections as set forth above. Google further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to Dismiss should be propounded judiciously. Google has already provided responses to 41 different Requests and begun producing responsive documents to the first two sets of Requests for Production

1 of Documents; (ii) it is vague and ambiguous as to the undefined terms “how Google improved its  
 2 Google products and services” and “data Google obtained and currently obtains”; (iii) it is overbroad  
 3 and unduly burdensome and seeks documents that are not relevant to any claim or defense in this  
 4 Action; (iv) it is unduly burdensome, overboard, and disproportionate to the needs of the Action to the  
 5 extent that it is unbounded in time and/or seeks documents from a time period unrelated to the  
 6 operative factual allegations; and (v) it seeks documents protected by the attorney-client privilege  
 7 and/or the attorney work-product doctrine.

8 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 9 and confer concerning whether and to what extent there is an appropriate scope of production that  
 10 is a subset of this Request.

11 **REQUEST FOR PRODUCTION NO. 61:**

12 Documents concerning all ways in which Google has benefited from the conduct alleged in this  
 13 lawsuit, including without limitation advertising revenues, impact on Google’s market power, and  
 14 improvement or development of additional Google services or products.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 61:**

16 Google incorporates its general responses and objections as set forth above. Google  
 17 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 18 abusive given Judge Seeborg’s admonition that discovery prior to adjudication of the Motion to  
 19 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 20 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 21 of Documents; (ii) it is vague and ambiguous as to the undefined terms “all ways in which Google has  
 22 benefited from the conduct,” “without limitation advertising revenues,” and “impact on Google’s  
 23 market power, and improvement or development of additional Google services or products;” (iii) it is  
 24 overbroad and unduly burdensome and seeks documents that are not relevant to any claim or defense  
 25 in this Action; (iv) it is unduly burdensome, overboard, and disproportionate to the needs of the Action  
 26 to the extent that it is unbounded in time and/or seeks documents from a time period unrelated to the  
 27 operative factual allegations; (v) it seeks documents protected by the attorney-client privilege and/or  
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1 the attorney work-product doctrine; and (vi) it seeks the production of documents that are not in  
 2 Google's possession, custody, or control.

3 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 4 and confer concerning whether and to what extent there is an appropriate scope of production that  
 5 is a subset of this Request.

6 **REQUEST FOR PRODUCTION NO. 63:**

7 Documents concerning the Google 10-K representations quoted in paragraphs 166 through 168  
 8 of the First Amended Complaint.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 63:**

10 Google incorporates its general responses and objections as set forth above. Google  
 11 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 12 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 13 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 14 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 15 of Documents; (ii) it is vague and ambiguous as to the undefined term "Google 10-K representations;"  
 16 (iii) it is overbroad and unduly burdensome and seeks documents that are not relevant to any claim or  
 17 defense in this Action; (iv) it is unduly burdensome, overboard, and disproportionate to the needs of  
 18 the Action to the extent that it is unbounded in time and/or seeks documents from a time period  
 19 unrelated to the operative factual allegations; (v) it seeks documents protected by the attorney-client  
 20 privilege and/or the attorney work-product doctrine; and (vi) it seeks the production of documents that  
 21 are not in Google's possession, custody, or control.

22 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 23 and confer concerning whether and to what extent there is an appropriate scope of production that  
 24 is a subset of this Request.

25 **REQUEST FOR PRODUCTION NO. 64:**

26 Documents concerning the Android contractual terms and proceedings that led to the publication  
 27 of the report referenced in paragraph 171 of the First Amended Complaint.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 64:**

2 Google incorporates its general responses and objections as set forth above. Google  
 3 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 4 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 5 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 6 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 7 of Documents; (ii) it is vague and ambiguous as to the undefined term "Android contractual terms and  
 8 proceedings;" (iii) it is overbroad and unduly burdensome and seeks documents that are not relevant  
 9 to any claim or defense in this Action; (iv) it is unduly burdensome, overboard, and disproportionate to  
 10 the needs of the Action to the extent that it is unbounded in time and/or seeks documents from a time  
 11 period unrelated to the operative factual allegations; (v) it seeks documents protected by the attorney-  
 12 client privilege and/or the attorney work-product doctrine; and (vi) it seeks the production of  
 13 documents that are not in Google's possession, custody, or control.

14 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 15 and confer concerning whether and to what extent there is an appropriate scope of production that  
 16 is a subset of this Request.

17 **REQUEST FOR PRODUCTION NO. 65:**

18 Documents concerning "on-device search," as referenced in paragraph 129 of the First Amended  
 19 Complaint.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 65:**

21 Google incorporates its general responses and objections as set forth above. Google  
 22 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 23 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 24 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 25 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 26 of Documents; (ii) it is vague and ambiguous as to the undefined term "on-device search"; (iii) it is  
 27 overbroad and unduly burdensome and seeks documents that are not relevant to any claim or defense

1 in this Action; (iv) it is unduly burdensome, overboard, and disproportionate to the needs of the Action  
 2 to the extent that it is unbounded in time and/or seeks documents from a time period unrelated to the  
 3 operative factual allegations; (v) it seeks documents protected by the attorney-client privilege and/or  
 4 the attorney work-product doctrine; and (vi) it seeks the production of documents that are not in  
 5 Google's possession, custody, or control.

6 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 7 and confer concerning whether and to what extent there is an appropriate scope of production that  
 8 is a subset of this Request.

9 **REQUEST FOR PRODUCTION NO. 69:**

10 Documents sufficient to identify, by month during the Class Period, the number of users for  
 11 which Google collected data while users had Web & App Activity turned off.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 69:**

13 Google incorporates its general responses and objections as set forth above. Google  
 14 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 15 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 16 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 17 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 18 of Documents; (ii) it is vague and ambiguous as to the undefined term "Google collected data"; (iii) it  
 19 is overbroad and unduly burdensome and seeks documents that are not relevant to any claim or  
 20 defense in this Action; (iv) it is unduly burdensome, overboard, and disproportionate to the needs of  
 21 the Action to the extent that it is unbounded in time and/or seeks documents from a time period  
 22 unrelated to the operative factual allegations; (v) it seeks documents protected by the attorney-client  
 23 privilege and/or the attorney work-product doctrine; (vi) it seeks the production of documents that are  
 24 not in Google's possession, custody, or control; (vii) it is duplicative of at least Request Nos. 32 and  
 25 67; and (viii) this Request is premature because a class has not been certified in this Action.

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1           Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 2 and confer concerning whether and to what extent there is an appropriate scope of production that  
 3 is a subset of this Request.

4 **REQUEST FOR PRODUCTION NO. 70:**

5           Documents sufficient to identify the number of times, by month during the Class Period, Google  
 6 collected data while users had Web & App Activity turned off.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 70:**

8           Google incorporates its general responses and objections as set forth above. Google  
 9 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 10 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 11 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 12 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 13 of Documents; (ii) it is vague and ambiguous as to the undefined term "Google collected data"; (iii) it  
 14 is overbroad and unduly burdensome and seeks documents that are not relevant to any claim or  
 15 defense in this Action; (iv) it seeks documents protected by the attorney-client privilege and/or the  
 16 attorney work-product doctrine; (v) it seeks the production of documents that are not in Google's  
 17 possession, custody, or control; and (vi) it is duplicative of at least Request Nos. 32, 67, and 69.

18           Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 19 and confer concerning whether and to what extent there is an appropriate scope of production that  
 20 is a subset of this Request.

21 **REQUEST FOR PRODUCTION NO. 71:**

22           For each Google service and/or product that incorporates or utilizes the class members' data  
 23 (e.g., Google AdWords, Google AdSense, Google Analytics):

- 24           a.       Documents sufficient to determine each such service and/or product.
- 25           b.       Documents sufficient to determine how Google prices all such products and/or services.
- 26           c.       Documents sufficient to determine how Google generates revenues, cost savings, and/or  
 27                    profit from such products and/or services.

- d. Documents sufficient to understand how Google uses the class members' data to increase the prices, revenues, and/or profits associated with each such product and/or service (e.g., premium pricing for targeted versus non-targeted advertising).
- e. Documents sufficient to determine the incremental prices, revenues, market share, and/or profits generated by such products and/or services as a result of the class members' data.
- f. Documents sufficient to determine the drivers of customer demand for such products and/or services, their success in the marketplace, and their perceived advantages versus any competitive products and/or services.
- g. Documents concerning the types of customers (by industry, region, etc.) for such products and/or services and the value they place on the class members' data.
- h. Planning documents (e.g., business plans, technical architecture documents, marketing plans, sales plans, capital expenditure plans) related to such products and/or services.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 71:**

Google incorporates its general responses and objections as set forth above. Google further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and abusive given Judge Seeborg’s admonition that discovery prior to adjudication of the Motion to Dismiss should be propounded judiciously. Google has already provided responses to 41 different Requests and begun producing responsive documents to the first two sets of Requests for Production of Documents; (ii) it is vague and ambiguous as to the undefined terms “[f]or each Google service and/or product that incorporates or utilizes the class members’ data” and “how Google uses the class members’ data to increase the prices, revenue, and/or profits;” (iii) it is overbroad and unduly burdensome and seeks documents that are not relevant to any claim or defense in this Action; (iv) it is unduly burdensome, overboard, and disproportionate to the needs of the Action to the extent that it is unbounded in time and/or seeks documents from a time period unrelated to the operative factual allegations; (v) it seeks documents protected by the attorney-client privilege and/or the attorney work-product doctrine; (vi) it seeks the production of documents that are not in Google’s possession, custody, or control; (vii) it contains several subparts which constitute a separate Request; (viii) this

1 Request is premature because a class has not been certified in this Action; and (viv) it calls for the  
 2 disclosure of trade secrets or highly confidential and proprietary business information, the disclosure  
 3 of which threatens to harm Google.

4 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 5 and confer concerning whether and to what extent there is an appropriate scope of production that  
 6 is a subset of this Request.

7 **REQUEST FOR PRODUCTION NO. 72:**

8 Documents pertaining to the value of user data during the Class Period, including:

- 9 a. Any Google estimates of the value of its user data either generally or to any products  
 10 and/or services.
- 11 b. Any third party estimates of the value of Google's or any other entities' user data either  
 12 generally or to any products and/or service.
- 13 c. Any estimate of the relationship, if any, between the value of incremental data on a given  
 14 user and the amount of data already collected on that user (i.e., the diminishing marginal  
 15 return on data), either generally or to any products and/or services.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 72:**

17 Google incorporates its general responses and objections as set forth above. Google  
 18 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 19 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 20 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 21 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 22 of Documents; (ii) it is vague and ambiguous as to the undefined terms "value of user data," "between  
 23 the value of incremental data on a given user and the amount of data already collected on that user,"  
 24 and "estimate of the relationship;" (iii) it is overbroad and unduly burdensome and seeks documents  
 25 that are not relevant to any claim or defense in this Action; (iv) it seeks documents protected by the  
 26 attorney-client privilege and/or the attorney work-product doctrine; (v) it seeks the production of  
 27 documents that are not in Google's possession, custody, or control; (vi) it contains several subparts  
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1 which constitute a separate Request; and (vii) it calls for the disclosure of trade secrets or highly  
 2 confidential and proprietary business information, the disclosure of which threatens to harm Google.

3 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 4 and confer concerning whether and to what extent there is an appropriate scope of production that  
 5 is a subset of this Request.

6 **REQUEST FOR PRODUCTION NO. 73:**

7 Documents pertaining to Google's purchase or sale of user data from any third party, including  
 8 documents sufficient to determine the types of data transacted, the price paid/received for the data,  
 9 and/or any other relevant terms of the transaction.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 73:**

11 Google incorporates its general responses and objections as set forth above. Google  
 12 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 13 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 14 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 15 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 16 of Documents; (ii) it is vague and ambiguous as to the undefined term "Google's purchase or sale of  
 17 user data from any third party;" (iii) it is overbroad and unduly burdensome and seeks documents that  
 18 are not relevant to any claim or defense in this Action; (iv) it seeks documents protected by the  
 19 attorney-client privilege and/or the attorney work-product doctrine; (v) it seeks the production of  
 20 documents that are not in Google's possession, custody, or control; and (vi) it is unduly burdensome,  
 21 overboard, and disproportionate to the needs of the Action to the extent that it is unbounded in time  
 22 and/or seeks documents from a time period unrelated to the operative factual allegations.

23 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 24 and confer concerning whether and to what extent there is an appropriate scope of production that  
 25 is a subset of this Request.

26 **REQUEST FOR PRODUCTION NO. 74:**

1 Documents pertaining to Google's purchases or sales of entities (e.g., companies, divisions,  
 2 business groups) in which user data constituted a material portion of the assets transacted, including  
 3 documents sufficient to determine the portion of the price paid/received attributable to the user data and  
 4 all relevant terms of the transaction.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 74:**

6 Google incorporates its general responses and objections as set forth above. Google  
 7 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 8 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 9 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 10 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 11 of Documents; (ii) it is vague and ambiguous as to the undefined terms "Google's purchase or sale of  
 12 entities" and "user data constituted a material portion of the assets transacted;" (iii) it is overbroad and  
 13 unduly burdensome and seeks documents that are not relevant to any claim or defense in this Action;  
 14 (iv) it seeks documents protected by the attorney-client privilege and/or the attorney work-product  
 15 doctrine; (v) it seeks the production of documents that are not in Google's possession, custody, or  
 16 control; and (vi) it is unduly burdensome, overboard, and disproportionate to the needs of the Action to  
 17 the extent that it is unbounded in time and/or seeks documents from a time period unrelated to the  
 18 operative factual allegations.

19 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 20 and confer concerning whether and to what extent there is an appropriate scope of production that  
 21 is a subset of this Request.

22 **REQUEST FOR PRODUCTION NO. 75:**

23 Periodic financial statements adequate to determine the following for each of the Google  
 24 product and/or service that incorporates or utilizes the class members' data:

25     a.    Revenue;  
 26     b.    Cost of Goods Sold;  
 27     c.    Operating Expenses;

1                   d.     Variable Expenses;  
 2                   e.     Fixed Expenses; and  
 3                   f.     Profit.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 75:**

5                   Google incorporates its general responses and objections as set forth above. Google  
 6 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 7 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 8 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 9 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 10 of Documents; (ii) it is vague and ambiguous as to the undefined term "periodic financial statements  
 11 adequate to determine;" (iii) it is overbroad and unduly burdensome and seeks documents that are not  
 12 relevant to any claim or defense in this Action; (iv) it seeks documents protected by the attorney-client  
 13 privilege and/or the attorney work-product doctrine; (v) it seeks the production of documents that are  
 14 not in Google's possession, custody, or control; (vi) it contains several subparts which constitute a  
 15 separate Request; (vii) it calls for the disclosure of trade secrets or highly confidential and proprietary  
 16 business information, the disclosure of which threatens to harm Google; and (viii) this Request is  
 17 premature because a class has not been certified in this Action.

18                   Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 19 and confer concerning whether and to what extent there is an appropriate scope of production that  
 20 is a subset of this Request.

21 **REQUEST FOR PRODUCTION NO. 76:**

22                   All planning documents (e.g., business plans, technical architecture documents, marketing plans,  
 23 sales plans, capital expenditure plans) related to Google's collection and/or use of class member data.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 76:**

25                   Google incorporates its general responses and objections as set forth above. Google  
 26 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 27 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to

1 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 2 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 3 of Documents; (ii) it is vague and ambiguous as to the undefined terms “all planning documents,”  
 4 “Google’s collection and/or use of class member data,” and “technical architecture documents;” (iii) it  
 5 is overbroad and unduly burdensome and seeks documents that are not relevant to any claim or  
 6 defense in this Action; (iv) it seeks documents protected by the attorney-client privilege and/or the  
 7 attorney work-product doctrine; (v) it calls for the disclosure of trade secrets or highly confidential and  
 8 proprietary business information, the disclosure of which threatens to harm Google; (vi) it is unduly  
 9 burdensome, overboard, and disproportionate to the needs of the Action to the extent that it is  
 10 unbounded in time and/or seeks documents from a time period unrelated to the operative factual  
 11 allegations; and (vii) this Request is premature because a class has not been certified in this Action.

12 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 13 and confer concerning whether and to what extent there is an appropriate scope of production that  
 14 is a subset of this Request.

15 **REQUEST FOR PRODUCTION NO. 77:**

16 Documents, studies, reports, and articles that describe or pertain to the market for user data,  
 17 including class member data.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 77:**

19 Google incorporates its general responses and objections as set forth above. Google  
 20 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 21 abusive given Judge Seeborg’s admonition that discovery prior to adjudication of the Motion to  
 22 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 23 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 24 of Documents; (ii) it is vague and ambiguous as to the undefined term “that describe or pertain to the  
 25 market for user data;” (iii) it is overbroad and unduly burdensome and seeks documents that are not  
 26 relevant to any claim or defense in this Action; (iv) it seeks documents protected by the attorney-client  
 27 privilege and/or the attorney work-product doctrine; (v) it is unduly burdensome, overboard, and

1 disproportionate to the needs of the Action to the extent that it is unbounded in time and/or seeks  
 2 documents from a time period unrelated to the operative factual allegations; and (vi) it seeks the  
 3 production of documents that are not in Google's possession, custody, or control.

4 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 5 and confer concerning whether and to what extent there is an appropriate scope of production that  
 6 is a subset of this Request.

7 **REQUEST FOR PRODUCTION NO. 78:**

8 Documents sufficient to understand how Google determines compensation for tracking user's  
 9 data related to but not limited to how Google determines compensation for participants in the "Google  
 10 Screenwise Trends" program.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 78:**

12 Google incorporates its general responses and objections as set forth above. Google  
 13 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 14 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 15 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 16 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 17 of Documents; (ii) it is vague and ambiguous as to the undefined terms "Google determine  
 18 compensation for tracking user's data" and "Google Screenwise Trends program;" (iii) it is overbroad  
 19 and unduly burdensome and seeks documents that are not relevant to any claim or defense in this  
 20 Action; (iv) it seeks documents protected by the attorney-client privilege and/or the attorney work-  
 21 product doctrine; (v) it is unduly burdensome, overboard, and disproportionate to the needs of the  
 22 Action to the extent that it is unbounded in time and/or seeks documents from a time period unrelated  
 23 to the operative factual allegations; and (vi) it seeks the production of documents that are not in  
 24 Google's possession, custody, or control.

25 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 26 and confer concerning whether and to what extent there is an appropriate scope of production that  
 27 is a subset of this Request.

**REQUEST FOR PRODUCTION NO. 79:**

Documents concerning any valuation of user data, including data Google collected while users had Web & App Activity turned off.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 79:**

Google incorporates its general responses and objections as set forth above. Google further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to Dismiss should be propounded judiciously. Google has already provided responses to 41 different Requests and begun producing responsive documents to the first two sets of Requests for Production of Documents; (ii) it is vague and ambiguous as to the undefined term "valuation of user data"; (iii) it is overbroad and unduly burdensome and seeks documents that are not relevant to any claim or defense in this Action; (iv) it seeks documents protected by the attorney-client privilege and/or the attorney work-product doctrine; (v) it is unduly burdensome, overboard, and disproportionate to the needs of the Action to the extent that it is unbounded in time and/or seeks documents from a time period unrelated to the operative factual allegations; (vi) it seeks the production of documents that are not in Google's possession, custody, or control; and (vii) it is duplicative of at least Request No. 72.

Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet and confer concerning whether and to what extent there is an appropriate scope of production that is a subset of this Request.

**REQUEST FOR PRODUCTION NO. 80:**

Documents concerning the prices charged by Google during the Class Period in connection with its advertising services, including higher prices Google charged using the data Google collected while users had Web & App Activity turned off.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 80:**

Google incorporates its general responses and objections as set forth above. Google further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to

1 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 2 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 3 of Documents; (ii) it is vague and ambiguous as to the undefined terms “data Google collected” and  
 4 “including higher prices Google charged using the data Google collected;” (iii) it is overbroad and  
 5 unduly burdensome and seeks documents that are not relevant to any claim or defense in this Action;  
 6 (iv) it seeks documents protected by the attorney-client privilege and/or the attorney work-product  
 7 doctrine; and (v) it seeks the production of documents that are not in Google’s possession, custody, or  
 8 control.

9 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 10 and confer concerning whether and to what extent there is an appropriate scope of production that  
 11 is a subset of this Request.

12 **REQUEST FOR PRODUCTION NO. 82:**

13 Documents concerning Google’s market power in search since January 1, 2005, including any  
 14 impact on that market power based on Google’s collection of data while users had Web & App Activity  
 15 turned off.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 82:**

17 Google incorporates its general responses and objections as set forth above. Google  
 18 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 19 abusive given Judge Seeborg’s admonition that discovery prior to adjudication of the Motion to  
 20 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 21 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 22 of Documents; (ii) it is vague and ambiguous as to the undefined terms “[d]ocuments concerning  
 23 Google’s market power,” “collection of data,” and “impact on that market power;” (iii) it is overbroad  
 24 and unduly burdensome and seeks documents that are not relevant to any claim or defense in this  
 25 Action; (iv) it seeks documents protected by the attorney-client privilege and/or the attorney work-  
 26 product doctrine; and (v) it seeks the production of documents that are not in Google’s possession,  
 27 custody, or control.

**REQUEST FOR PRODUCTION NO. 83:**

Documents concerning Google's power in the market(s) for internet browsers since January 1, 2005, including any impact on that market power based on Google's collection of data while users had Web & App Activity turned off.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 83:**

Google incorporates its general responses and objections as set forth above. Google further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to Dismiss should be propounded judiciously. Google has already provided responses to 41 different Requests and begun producing responsive documents to the first two sets of Requests for Production of Documents; (ii) it is vague and ambiguous as to the undefined terms "[d]ocuments concerning Google's market power for internet browsers," "power in the market(s)," and "collection of data;" (iii) it is overbroad and unduly burdensome and seeks documents that are not relevant to any claim or defense in this Action; (iv) it seeks documents protected by the attorney-client privilege and/or the attorney work-product doctrine; and (v) it seeks the production of documents that are not in Google's possession, custody, or control.

**REQUEST FOR PRODUCTION NO. 84:**

Documents concerning Google's power in the market(s) for advertising services since January 1, 2005, including any impact on that market power based on Google's collection of data while users had Web & App Activity turned off.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 84:**

Google incorporates its general responses and objections as set forth above. Google further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to Dismiss should be propounded judiciously. Google has already provided responses to 41 different Requests and begun producing responsive documents to the first two sets of Requests for Production of Documents; (ii) it is vague and ambiguous as to the undefined terms "[d]ocuments concerning

1 Google's market power for advertising services," "power in the market(s)," and "collection of data;"  
 2 (iii) it is overbroad and unduly burdensome and seeks documents that are not relevant to any claim or  
 3 defense in this Action; (iv) it seeks documents protected by the attorney-client privilege and/or the  
 4 attorney work-product doctrine; and (v) it seeks the production of documents that are not in Google's  
 5 possession, custody, or control.

6 **REQUEST FOR PRODUCTION NO. 85:**

7 Documents concerning Google competitors or competing proposals that permit consumers to  
 8 monetize their data, including Brave, Loginhood, Killi, BIGtoken, Andrew Yang's Data Dividend  
 9 Project, and Nielsen Company.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 85:**

11 Google incorporates its general responses and objections as set forth above. Google  
 12 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 13 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 14 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 15 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 16 of Documents; (ii) it is vague and ambiguous as to the undefined terms "Brave," "Loginhood," "Killi,"  
 17 "BIGtoken," "Andrew Yang's Data Dividend Project," and "Nielson Company;" (iii) it is overbroad  
 18 and unduly burdensome and seeks documents that are not relevant to any claim or defense in this  
 19 Action; (iv) it seeks documents protected by the attorney-client privilege and/or the attorney work-  
 20 product doctrine; and (v) it seeks the production of documents that are not in Google's possession,  
 21 custody, or control.

22 **REQUEST FOR PRODUCTION NO. 86:**

23 Documents sufficient to show all data Google used to target advertisements to Plaintiffs.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 86:**

25 Google incorporates its general responses and objections as set forth above. Google  
 26 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 27 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
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1 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 2 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 3 of Documents; (ii) it is vague and ambiguous as to the undefined term “all data Google used to target  
 4 advertisements to Plaintiffs;” (iii) it is overbroad and unduly burdensome and seeks documents that are  
 5 not relevant to any claim or defense in this Action; (iv) it seeks documents protected by the attorney-  
 6 client privilege and/or the attorney work-product doctrine; (v) it is unduly burdensome, overboard, and  
 7 disproportionate to the needs of the Action to the extent that it is unbounded in time and/or seeks  
 8 documents from a time period unrelated to the operative factual allegations; and (vi) it seeks the  
 9 production of documents that are not in Google’s possession, custody, or control.

10 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 11 and confer concerning whether and to what extent there is an appropriate scope of production that  
 12 is a subset of this Request and in accordance with the Stored Communications Act.

13 **REQUEST FOR PRODUCTION NO. 88:**

14 Documents sufficient to show all Google revenues tied to advertising to class members while  
 15 they had Web & App Activity turned off.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 88:**

17 Google incorporates its general responses and objections as set forth above. Google  
 18 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 19 abusive given Judge Seeborg’s admonition that discovery prior to adjudication of the Motion to  
 20 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 21 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 22 of Documents; (ii) it is vague and ambiguous as to the undefined term “all Google revenues tied to  
 23 advertising;” (iii) it is overbroad and unduly burdensome and seeks documents that are not relevant to  
 24 any claim or defense in this Action; (iv) it seeks documents protected by the attorney-client privilege  
 25 and/or the attorney work-product doctrine; (v) it is unduly burdensome, overboard, and  
 26 disproportionate to the needs of the Action to the extent that it is unbounded in time and/or seeks  
 27 documents from a time period unrelated to the operative factual allegations; (vi) it seeks the  
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1 production of documents that are not in Google's possession, custody, and control; and (vii) this  
 2 Request is premature because a class has not been certified in this Action.

3 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 4 and confer concerning whether and to what extent there is an appropriate scope of production that  
 5 is a subset of this Request.

6 **REQUEST FOR PRODUCTION NO. 89:**

7 Documents concerning any auto-delete functionality or controls concerning user data, including  
 8 how such functionality impacts data Google collected while users had Web & App Activity turned off.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 89:**

10 Google incorporates its general responses and objections as set forth above. Google  
 11 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 12 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 13 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 14 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 15 of Documents; (ii) it is vague and ambiguous as to the undefined term "any auto-delete functionality or  
 16 controls concerning user data;" (iii) it is overbroad and unduly burdensome and seeks documents that  
 17 are not relevant to any claim or defense in this Action; (iv) it seeks documents protected by the  
 18 attorney-client privilege and/or the attorney work-product doctrine; (v) it is unduly burdensome,  
 19 overboard, and disproportionate to the needs of the Action to the extent that it is unbounded in time  
 20 and/or seeks documents from a time period unrelated to the operative factual allegations; and (vi) it  
 21 seeks the production of documents that are not in Google's possession, custody, and control.

22 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 23 and confer concerning whether and to what extent there is an appropriate scope of production that  
 24 is a subset of this Request.

25 **REQUEST FOR PRODUCTION NO. 90:**

26 Copies of all documents linked to or in any internal Google wikis and sites produced by Google.

27 **RESPONSE TO REQUEST FOR PRODUCTION NO. 90:**

1 Google incorporates its general responses and objections as set forth above. Google  
 2 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 3 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 4 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 5 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 6 of Documents; (ii) it is vague and ambiguous as to the undefined term "Google wikis and sites  
 7 produced by Google;" (iii) it is overbroad and unduly burdensome and seeks documents that are not  
 8 relevant to any claim or defense in this Action; (iv) it is unduly burdensome, overboard, and  
 9 disproportionate to the needs of the Action to the extent that it is unbounded in time and/or seeks  
 10 documents from a time period unrelated to the operative factual allegations; (v) it seeks the production  
 11 of documents that are not in Google's possession, custody, and control; and (vi) it seeks documents  
 12 protected by the attorney-client privilege and/or the attorney work-product doctrine.

13 **REQUEST FOR PRODUCTION NO. 91:**

14 Documents sufficient to identify all code-words or codenames used in connection with any of  
 15 the alleged issues, including Web & App Activity and Firebase.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 91:**

17 Google incorporates its general responses and objections as set forth above. Google  
 18 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 19 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 20 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 21 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 22 of Documents; (ii) it is vague and ambiguous as to the undefined term "identify all code-words or  
 23 codenames used in connection with any of the alleged issues" and "Firebase;" (iii) it is overbroad and  
 24 unduly burdensome and seeks documents that are not relevant to any claim or defense in this Action;  
 25 (iv) it seeks documents protected by the attorney-client privilege and/or the attorney work-product  
 26 doctrine; (v) it is unduly burdensome, overboard, and disproportionate to the needs of the Action to the  
 27 extent that it is unbounded in time and/or seeks documents from a time period unrelated to the  
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1 operative factual allegations; (vi) it seeks the production of documents that are not in Google's  
 2 possession, custody, or control; (vii) it contains several subparts which constitute a separate Request;  
 3 and (viii) it calls for the disclosure of trade secrets or highly confidential and proprietary business  
 4 information, the disclosure of which threatens to harm Google.

5 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 6 and confer concerning whether and to what extent there is an appropriate scope of production that  
 7 is a subset of this Request.

8 **REQUEST FOR PRODUCTION NO. 93:**

9 Documents concerning any defense Google asserts in this action, including documents  
 10 supporting or contradicting any defense.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 93:**

12 Google incorporates its general responses and objections as set forth above. Google  
 13 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 14 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 15 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 16 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 17 of Documents; (ii) it seeks documents protected by the attorney-client privilege and/or the attorney  
 18 work-product doctrine; (iii) it seeks the production of documents that are not in Google's possession,  
 19 custody, or control; and (iv) it is duplicative of at least Request No. 17.

20 Subject to and without waiving the foregoing objections, Google responds that it will  
 21 produce any documents upon which it intends to rely to support its defenses.

22 **REQUEST FOR PRODUCTION NO. 94:**

23 Documents discussing, analyzing, or evaluating any of the privacy rights asserted in this lawsuit.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 94:**

25 Google incorporates its general responses and objections as set forth above. Google  
 26 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 27 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
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1 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 2 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 3 of Documents; (ii) it is vague and ambiguous as to the undefined term “privacy rights;” (iii) it seeks  
 4 documents protected by the attorney-client privilege and/or the attorney work-product doctrine; (iv) it  
 5 is unduly burdensome, overboard, and disproportionate to the needs of the Action to the extent that it  
 6 is unbounded in time and/or seeks documents from a time period unrelated to the operative factual  
 7 allegations; (v) it seeks the production of documents that are not in Google’s possession, custody, or  
 8 control; and (vi) it is duplicative of at least Request No. 17.

9 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 10 and confer concerning whether and to what extent there is an appropriate scope of production that  
 11 is a subset of this Request.

12 **REQUEST FOR PRODUCTION NO. 95:**

13 Documents concerning any aggregation of data collected in connection with users’ activity while  
 14 they had Web & App Activity turned off.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 95:**

16 Google incorporates its general responses and objections as set forth above. Google  
 17 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 18 abusive given Judge Seeborg’s admonition that discovery prior to adjudication of the Motion to  
 19 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 20 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 21 of Documents; (ii) it is vague and ambiguous as to the undefined terms “any aggregation of data  
 22 collected” and “user’s activity;” (iii) it seeks documents protected by the attorney-client privilege  
 23 and/or the attorney work-product doctrine; (iv) it is unduly burdensome, overboard, and  
 24 disproportionate to the needs of the Action to the extent that it is unbounded in time and/or seeks  
 25 documents from a time period unrelated to the operative factual allegations; (v) it seeks the production  
 26 of documents that are not in Google’s possession, custody, or control; (vi) it is overbroad and unduly  
 27  
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1 burdensome and seeks documents that are not relevant to any claim or defense in this Action; and (vii)  
 2 this Request is premature because a class has not been certified in this Action.

3 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 4 and confer concerning whether and to what extent there is an appropriate scope of production that  
 5 is a subset of this Request.

6 **REQUEST FOR PRODUCTION NO. 96:**

7 Documents sufficient to show the location of Google servers involved in the alleged conduct,  
 8 including servers located in California that received data in connection with users' activity while they  
 9 had Web & App Activity turned off.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 96:**

11 Google incorporates its general responses and objections as set forth above. Google  
 12 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 13 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 14 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 15 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 16 of Documents; (ii) it is vague and ambiguous as to the undefined terms "show the location of Google  
 17 servers involved in the alleged conduct" and "received data;" (iii) it seeks documents protected by the  
 18 attorney-client privilege and/or the attorney work-product doctrine; (iv) it is unduly burdensome,  
 19 overboard, and disproportionate to the needs of the Action to the extent that it is unbounded in time  
 20 and/or seeks documents from a time period unrelated to the operative factual allegations; and (v) it is  
 21 overbroad and unduly burdensome and seeks documents that are not relevant to any claim or defense  
 22 in this Action.

23 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 24 and confer concerning whether and to what extent there is an appropriate scope of production that  
 25 is a subset of this Request.

1 **REQUEST FOR PRODUCTION NO. 97:**

2 Documents sufficient to show the location of Google use of data in connection with users'  
 3 activity while they had Web & App Activity turned off, including by Google employees located in  
 4 California.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 97:**

6 Google incorporates its general responses and objections as set forth above. Google  
 7 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 8 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 9 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 10 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 11 of Documents; (ii) it is vague and ambiguous as to the undefined term "Google use of data;" (iii) it  
 12 seeks documents protected by the attorney-client privilege and/or the attorney work-product doctrine;  
 13 (iv) it is unduly burdensome, overboard, and disproportionate to the needs of the Action to the extent  
 14 that it is unbounded in time and/or seeks documents from a time period unrelated to the operative  
 15 factual allegations; (v) it is overbroad and unduly burdensome and seeks documents that are not  
 16 relevant to any claim or defense in this Action; (vi) it seeks documents that are not in Google's  
 17 possession, custody, or control; and (vii) this Request is premature because a class has not been  
 18 certified in this Action.

19 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 20 and confer concerning whether and to what extent there is an appropriate scope of production that  
 21 is a subset of this Request.

22 **REQUEST FOR PRODUCTION NO. 98:**

23 Documents concerning the articles cited in the First Amended Complaint, such as the November  
 24 1, 2018 article by Lily Hay Newman titled *The Privacy Battle to Save Google from Itself*.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 98:**

26 Google incorporates its general responses and objections as set forth above. Google  
 27 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 28

1 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 2 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 3 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 4 of Documents; (ii) it is vague and ambiguous as to the undefined term "concerning the articles cited in  
 5 the First Amended Complaint;" (iii) it seeks documents protected by the attorney-client privilege  
 6 and/or the attorney work-product doctrine; (iv) it is unduly burdensome, overboard, and  
 7 disproportionate to the needs of the Action to the extent that it is unbounded in time and/or seeks  
 8 documents from a time period unrelated to the operative factual allegations; (v) it is overbroad and  
 9 unduly burdensome and seeks documents that are not relevant to any claim or defense in this Action;  
 10 and (vi) it seeks documents that are not in Google's possession, custody, or control.

11 **REQUEST FOR PRODUCTION NO. 99:**

12 Documents sufficient to show the architecture pertaining to Google's sign-in, including how that  
 13 impacts Google's data collection in connection with users' activity while they had Web & App Activity  
 14 turned off.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 99:**

16 Google incorporates its general responses and objections as set forth above. Google  
 17 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 18 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 19 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 20 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 21 of Documents; (ii) it is vague and ambiguous as to the undefined terms "architecture pertaining to  
 22 Google's sign in" and "impacts Google's data collection in connection with user's activity"; (iii) it  
 23 seeks documents protected by the attorney-client privilege and/or the attorney work-product doctrine;  
 24 (iv) it is unduly burdensome, overboard, and disproportionate to the needs of the Action to the extent  
 25 that it is unbounded in time and/or seeks documents from a time period unrelated to the operative  
 26 factual allegations; (v) it is overbroad and unduly burdensome and seeks documents that are not  
 27  
 28

1 relevant to any claim or defense in this Action; and (vi) it seeks documents that are not in Google's  
 2 possession, custody, or control.

3 **REQUEST FOR PRODUCTION NO. 100:**

4 Documents sufficient to identify all instances where Google shared any data collected in  
 5 connection with any users' activity while they had Web & App Activity turned off, such as in response  
 6 to any law enforcement or other request.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 100:**

8 Google incorporates its general responses and objections as set forth above. Google  
 9 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 10 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 11 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 12 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 13 of Documents; (ii) it is vague and ambiguous as to the undefined term "shared any data collected;"  
 14 (iii) it seeks documents protected by the attorney-client privilege and/or the attorney work-product  
 15 doctrine; (iv) it is unduly burdensome, overboard, and disproportionate to the needs of the Action to  
 16 the extent that it is unbounded in time and/or seeks documents from a time period unrelated to the  
 17 operative factual allegations; (v) it is overbroad and unduly burdensome and seeks documents that are  
 18 not relevant to any claim or defense in this Action; and (vi) it seeks documents that are not in Google's  
 19 possession, custody, or control.

20 **REQUEST FOR PRODUCTION NO. 101:**

21 To the extent Google's response to any request for admissions served by Plaintiffs in this action  
 22 is anything other than an unqualified admission, documents concerning that matter at issue with each  
 23 such request for admission.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 101:**

25 Google incorporates its general responses and objections as set forth above. Google  
 26 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 27 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 28

1 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 2 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 3 of Documents; (ii) it contains several subparts which constitute a separate Request; (iii) it seeks  
 4 documents protected by the attorney-client privilege and/or the attorney work-product doctrine; (iv) it  
 5 is unduly burdensome, overboard, and disproportionate to the needs of the Action to the extent that it  
 6 is unbounded in time and/or seeks documents from a time period unrelated to the operative factual  
 7 allegations; (v) it is overbroad and unduly burdensome and seeks documents that are not relevant to  
 8 any claim or defense in this Action; and (vi) it seeks documents that are not in Google's possession,  
 9 custody, or control. Google further objects that this request is impermissibly compound.

10 **REQUEST FOR PRODUCTION NO. 102:**

11 Documents sufficient to show users visits to and use of Google's "Privacy Checkup" website  
 12 and Google's privacy settings, on a periodic basis (e.g., monthly).

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 102:**

14 Google incorporates its general responses and objections as set forth above. Google  
 15 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 16 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 17 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 18 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 19 of Documents; (ii) it is vague and ambiguous as to the undefined term "Google's Privacy Checkup  
 20 Website;" (iii) it seeks documents protected by the attorney-client privilege and/or the attorney work-  
 21 product doctrine; (iv) it is unduly burdensome, overboard, and disproportionate to the needs of the  
 22 Action to the extent that it is unbounded in time and/or seeks documents from a time period unrelated  
 23 to the operative factual allegations; (v) it is overbroad and unduly burdensome and seeks documents  
 24 that are not relevant to any claim or defense in this Action; (vi) it seeks documents that are not in  
 25 Google's possession, custody, or control; and (vii) this Request is premature because a class has not  
 26 been certified in this Action.

27 **REQUEST FOR PRODUCTION NO. 103:**

1 Documents concerning the creation, meaning of, and any changes to Google's "Privacy and  
 2 Security Principles."

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 103:**

4 Google incorporates its general responses and objections as set forth above. Google  
 5 further objects to this Request on the grounds that: (i) it is unduly burdensome, premature, and  
 6 abusive given Judge Seeborg's admonition that discovery prior to adjudication of the Motion to  
 7 Dismiss should be propounded judiciously. Google has already provided responses to 41 different  
 8 Requests and begun producing responsive documents to the first two sets of Requests for Production  
 9 of Documents; (ii) it is vague and ambiguous as to the undefined term "Google's Privacy and Security  
 10 Principles;" (iii) it seeks documents protected by the attorney-client privilege and/or the attorney  
 11 work-product doctrine; (iv) it is unduly burdensome, overboard, and disproportionate to the needs of  
 12 the Action to the extent that it is unbounded in time and/or seeks documents from a time period  
 13 unrelated to the operative factual allegations; (v) it is overbroad and unduly burdensome and seeks  
 14 documents that are not relevant to any claim or defense in this Action; and (vi) it seeks documents that  
 15 are not in Google's possession, custody, or control.

16 Subject to and without waiving the foregoing objections, Google invites Plaintiffs to meet  
 17 and confer concerning whether and to what extent there is an appropriate scope of production that  
 18 is a subset of this Request.

19 Dated: March 17, 2021  
 20

21 WILLKIE FARR & GALLAGHER LLP  
 22

23 By: /s/ Eduardo E. Santacana  
 24 Benedict Y. Hur  
 25 Simona Agnolucci  
 26 Eduardo E. Santacana  
 27 Amanda Maya  
 28

29 *Attorneys for Defendant Google LLC*